

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

<div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>ZHONE TECHNOLOGIES, INC.</div> <div>Defendant.</div> </div>	Civil Action No. 13-cv-1836-RGA
<div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>ZYXEL COMMUNICATIONS, INC. and ZYXEL COMMUNICATIONS CORPORATION,</div> <div>Defendants.</div> </div>	Civil Action No. 13-cv-2013-RGA
<div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>ADTRAN, INC.</div> <div>Defendant.</div> </div>	Civil Action No. 14-cv-954-RGA
<div style="display: flex; justify-content: space-between;"> <div>ADTRAN, INC,</div> <div>Plaintiff,</div> </div> <div style="text-align: center;">v.</div> <div style="display: flex; justify-content: space-between;"> <div>TQ DELTA, LLC.</div> <div>Defendant.</div> </div>	Civil Action No. 15-cv-121-RGA

FAMILY 7 PATENTS JOINT CLAIM CONSTRUCTION CHART

Pursuant to ¶ 9 of the Court's Third and Final Scheduling Order, dated April 10, 2017, Plaintiff TQ Delta, LLC and Defendants in the above-captioned cases submit their Joint Claim Construction Chart ("Chart") for the Family 7 Patents (U.S. Patent Nos. 6,445,730 ("the '730 patent"), 7,978,753 ("the '753 patent"), 8,437,382 ("the '382 patent"), and 8,611,404 ("the '404 patent")).¹ The Chart attached as Exhibit A includes the parties' respective proposed constructions of the disputed language of the asserted claims of the Family 7 Patents. The Chart

¹ None of the Family 7 Patents are asserted against 2Wire LLC. Further, the '404 patent is asserted only against ADTRAN Inc.

includes citations to the parties' intrinsic evidence in support of such constructions. The parties reserve their rights to amend and/or supplement their disclosures.

In addition to the Joint Claim Construction Chart attached as Exhibit A, copies of the Family 7 Patents and U.S. Provisional Application No. 60/072,447 are attached as Exhibits B – F:

Exhibit	Description
B	730 Patent
C	753 Patent
D	382 Patent
E	404 Patent
F	447 Provisional Application

Dated: September 18, 2017

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (#4089)
Michael J. Farnan (#5165)
919 North Market Street, 12th Floor
Wilmington, Delaware 19801
(302) 777-0300
(302) 777-0301 (Fax)
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Counsel for Plaintiff TQ Delta, LLC

Respectfully submitted,

MORRIS JAMES LLP

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (Bar No. 3726)
500 Delaware Avenue, Suite 1500
Wilmington, Delaware 19801
(302) 888-6800
kdorsney@morrisjames.com

*Attorneys for Defendants Zyxel
Communications Inc. et. al.*

Seitz, Van Ogtrop, & Green, P.A.

/s/ James S. Green

James S. Green (Bar No. 481)
222 Delaware Avenue, Suite 1500
P. O. Box 68
Wilmington, DE 19899
(302) 888-0600
(302) 888-0606 (Fax)
green@svglaw.com

*Counsel for Defendant Zhone Technologies,
Inc..*

MORRIS JAMES LLP

/s/ Kenneth L. Dorsney

Kenneth L. Dorsney (Bar No. 3726)

500 Delaware Avenue, Suite 1500

Wilmington, Delaware 19801

(302) 888-6800

kdorsney@morrisjames.com

Attorneys for Defendant Adtran Inc.